

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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ENCOMPASS INSURANCE COMPANY OF  
MASSACHUSETTS,

Plaintiff,

v.

JOSEPH D. GIAMPA, FREDERICK T.  
GIAMPA, ADVANCED SPINE CENTERS, INC.  
d/b/a FIRST SPINE REHAB, FUTURE  
MANAGEMENT CORPORATION, FUTURE  
MANAGEMENT BUSINESS TRUST, EDWARD  
KENNEDY, BRIAN J. CULLINEY, D.C. and  
JENNIFER MCCONNELL, D.C.,

Defendants.

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Case No. 05-11693 RCL

**ANSWER**

Now comes Defendant Jennifer McConnell (“McConnell”) and hereby answers the numbered paragraphs of Plaintiff’s Second Amended Complaint (the “Complaint”) as follows:

**I. INTRODUCTION**

1. Paragraph 1 is introductory in nature and requires no response. To the extent that Paragraph 1 is deemed to contain allegations of wrongdoing by McConnell, they are denied.

2. Paragraph 2 is introductory in nature and requires no response. To the extent that Paragraph 2 is deemed to contain allegations of wrongdoing by McConnell, they are denied.

3. To the extent that Paragraph 3 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 3.

4. To the extent that Paragraph 4 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 4.

5. To the extent that Paragraph 5 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 5.

6. Denied.

## **II. THE PARTIES**

### **A. Plaintiff**

7. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 7.

8. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 8.

9. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 9.

10. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 10.

B. Defendants

11. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 11.

12. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 12.

13. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 13.

14. McConnell admits that First Spine did, at one time, have a place of business at 410 School Street, Lowell, Massachusetts, but lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in Paragraph 14.

15. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 15.

16. McConnell admits that Brian Culliney did, at certain times, practice chiropractic at First Spine, but lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in Paragraph 16.

17. McConnell admits that she is a resident of the Commonwealth of Massachusetts and that she did, at one time, practice Chiropractic at First Spine, but lacks knowledge or information sufficient to determine what Plaintiff intends by “all relevant times.”

**II. JURISDICTION AND VENUE**

18. The allegations of Paragraph 18 state a conclusion of law to which no response is required.

19. The allegations of Paragraph 19 state a conclusion of law to which no response is required. To the extent that Paragraph 19 is deemed to contain allegations of wrongdoing by McConnell, they are denied.

20. The allegations of Paragraph 20 state a conclusion of law to which no response is required.

**IV. FACTUAL ALLEGATIONS REGARDING CREATION AND ACTIVITIES OF FUTURE MANAGEMENT**

21. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 21.

22. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 22.

23. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 23.

24. Paragraph 24 purports to be a reservation of right by Plaintiff to which no response is required.

25. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 25.

26. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 26.

27. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 27.

28. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 28.

29. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 29.

30. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 30.

31. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 31.

32. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 32.

33. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 33.

**V. SPECIFIC ALLEGATIONS OF WRONGFUL CONDUCT**

**1. Culliney Conduct**

34. McConnell admits that certain Future Management employees were “Team Leaders,” but lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in Paragraph 34.

35. McConnell admits that Culliney was a “Team Leader” during a certain period of her employment with Future Management, but lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in Paragraph 35.

36. McConnell admits that Culliney, as a Team Leader, had certain supervisory authority at the First Spine Lowell clinic as well as other Giampa/Kennedy clinics in Massachusetts, but lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in Paragraph 36.

37. McConnell admits that Culliney coordinated the mailing of First Spine marketing materials, but lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in Paragraph 37.

38. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 38.

39. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 39.

40. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 40.

41. To the extent that Paragraph 41 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 41.

**2. McConnell Conduct**

42. Denied.

43. Denied.

44. Denied.

**3. Edward Kennedy Conduct**

45. McConnell admits that Edward Kennedy was, at one time, President of Future Management Corporation, but lacks knowledge or information sufficient to determine what Plaintiff intends by “all material times”.

46. McConnell admits that Edward Kennedy did, while President of Future Management, have certain supervisory authority at the First Spine Lowell clinic, but

lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in Paragraph 46.

47. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 47, except that McConnell denies that Edward Kennedy ever participated in the training of medical or non-medical staff during her employment with Future Management.

48. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 48.

49. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 49, but denies ever implementing a recipe of treatment inconsistent with patient needs during her employment with Future Management.

50. To the extent that Paragraph 50 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 50.

51. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 51.

52. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 52, but denies ever implementing a pre-ordained medical protocol or recipe of treatment during her employment with Future Management Corporation.

53. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 53.

**4. Joseph Giampa Conduct**

54. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 54.

55. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 55, but denies ever implementing a pre-ordained medical protocol or recipe of treatment during her employment with Future Management Corporation.

56. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 56.

57. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 57.

58. The allegations of Paragraph 58 state a conclusion of law to which no response is required.

**5. Frederick Giampa Conduct**

59. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 59.

60. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 60, but denies ever implementing a pre-ordained medical protocol or recipe of treatment during her employment with Future Management.



61. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 61.

62. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 62.

**VI. SPECIFIC ALLEGATIONS REGARDING PROHIBITED REFERRAL ACTIVITY**

63. The allegations of Paragraph 63 states a conclusion of law to which no response is required.

64. The allegations of Paragraph 64 states a conclusion of law to which no response is required.

65. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 65.

66. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 66.

67. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 67.

68. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 68.

69. To the extent that Paragraph 69 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 69.

70. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 70.

71. McConnell admits that Vinas was formerly a patient of Brian Culliney, but lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 71.

72. To the extent that Paragraph 72 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 72.

73. The allegations of Paragraph 73 state a conclusion of law to which no response is required. To the extent that Paragraph 73 is deemed to contain allegations of wrongdoing by McConnell, they are denied.

74. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 74.

75. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 75.

76. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 76.

77. The allegations of Paragraph 77 state a conclusion of law to which no response is required.

78. To the extent that Paragraph 78 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 78.

79. To the extent that Paragraph 79 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 79.

80. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 80.

81. To the extent that Paragraph 81 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 81.

82. The allegations of Paragraph 82 state a conclusion of law to which no response is required. To the extent that Paragraph 82 is deemed to contain allegations of wrongdoing by McConnell, they are denied.

83. To the extent that Paragraph 83 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 83.

**VII. FACTUAL ALLEGATIONS REGARDING FALSE MEDICAL BILLING SCHEME**

84. To the extent that Paragraph 84 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 84.

85. To the extent that Paragraph 85 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 85.

86. McConnell admits her understanding that Massachusetts chiropractors are licensed and monitored by the Massachusetts Board of Chiropractors.

87. The allegations of Paragraph 87 state a conclusion of law to which no response is required.

88. The allegations of Paragraph 88 state a conclusion of law to which no response is required. To the extent that Paragraph 88 is deemed to contain allegations of wrongdoing by McConnell, they are denied.

89. To the extent that Paragraph 89 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 89.

90. To the extent that Paragraph 90 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 90.

91. To the extent that Paragraph 91 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 91.

92. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 92.

93. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 93.

94. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 94.

95. To the extent that Paragraph 95 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 95.

96. To the extent that Paragraph 96 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 96.

97. To the extent that Paragraph 97 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 97.

98. McConnell admits to understanding that a CPT Code of 99205 indicates that the treating chiropractor obtained a comprehensive patient history, conducted a comprehensive examination, and evaluated the patient (face-to-face) interaction for approximately 60 minutes. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in Paragraph 98

99. To the extent that Paragraph 99 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 99.

100. To the extent that Paragraph 100 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 100.

101. McConnell admits that she did not generally review invoices for the chiropractic services she provided, but lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in Paragraph 101.

102. To the extent that Paragraph 102 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 102.

103. To the extent that Paragraph 103 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 103.

104. To the extent that Paragraph 104 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 104.

105. To the extent that Paragraph 105 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 105.

106. McConnell admits that First Spine assisted certain of its clinic patients to obtain legal representation in connection with motor vehicle accidents, but lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 106.

107. Denied.

108. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 108.

109. To the extent that Paragraph 109 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 109.

110. To the extent that Paragraph 110 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 110.

111. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 111.

112. To the extent that Paragraph 112 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 112.

113. To the extent that Paragraph 113 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 113.

114. To the extent that Paragraph 114 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 114.

115. To the extent that Paragraph 115 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 115.

116. To the extent that Paragraph 116 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 116.

117. To the extent that Paragraph 117 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 117.



**A. EXEMPLAR CLAIMS**

**1. Claimant(s): Aun Sok, Prach Phon, Thomg Rea m  
DOL: 10/02/04**

118. To the extent that Paragraph 118 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 118.

119. To the extent that Paragraph 119 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 119.

120. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 120.

121. To the extent that Paragraph 121 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 121.

122. To the extent that Paragraph 122 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 122.

123. To the extent that Paragraph 123 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 123.

124. To the extent that Paragraph 124 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 124.

125. To the extent that Paragraph 125 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 125.

126. To the extent that Paragraph 126 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 126.

127. To the extent that Paragraph 127 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 127.

128. To the extent that Paragraph 128 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 128.

**2. Claimant(s): Chareth Rath, Kan Peov, Kristina Rath, Saleen Phan,  
Vongdeane Khiaosoth  
DOL: 10/27/03**

129. To the extent that Paragraph 129 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 129.

130. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 130.

131. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 131.

132. To the extent that Paragraph 132 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 132.

133. To the extent that Paragraph 133 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 133.

134. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 134.

135. To the extent that Paragraph 135 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 135.

136. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 136.

137. To the extent that Paragraph 137 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 137.

138. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 138.

139. To the extent that Paragraph 139 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 139.

140. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 140.

141. To the extent that Paragraph 141 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 141.

142. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 142.

**3. Claimant(s): Den Tith**  
**DOL: 10/16/02**

143. To the extent that Paragraph 143 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 143.

144. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 144.

145. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 145.

146. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 146.

147. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 147.

148. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 148.

149. To the extent that Paragraph 149 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 149.

150. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 150.

151. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 151.

152. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 152.

**4. Claimant(s): Samnang Ngeth, Sitha Mam, Sitha Ngeth**  
**DOL: 3/15/02**

153. To the extent that Paragraph 153 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 153.

154. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 154.

155. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 155.

156. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 156.

157. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 157.

158. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 158.

159. To the extent that Paragraph 159 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 159.

160. To the extent that Paragraph 160 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 160.

161. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 161.

162. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 162.

163. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 163.

164. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 164.

165. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 165.

166. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 166.

167. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 167.

168. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 168.

169. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 169.

**5. Claimant(s): Anthony Aris, Alma Carrasquillo, Demetri Molina,  
Robert Delavalle  
DOL: 1/10/04**

170. To the extent that Paragraph 170 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 170.

171. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 171.

172. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 172.

173. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 173.

174. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 174.

175. To the extent that Paragraph 175 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 175.

176. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 176.

177. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 177.



178. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 178.

179. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 179.

180. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 180.

181. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 181.

182. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 182.

183. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 183.

184. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 184.

185. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 185.

**6. Claimant(s): Chhang Kang, Chada Kong, Phala Phoun  
DOL: 6/04/02**

186. To the extent that Paragraph 186 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 186.

187. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 187.

188. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 188.

189. To the extent that Paragraph 189 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 189.

190. To the extent that Paragraph 190 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 190.

191. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 191.

192. To the extent that Paragraph 192 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 192.

193. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 193.

194. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 194.

195. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 195.

196. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 196.

197. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 197.

198. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 198.

199. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 199.

200. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 200.

201. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 201.

202. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 202.

203. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 203.

204. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 204.

205. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 205.

206. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 206.

**7. Claimant(s): Sokean Phlong, Brandon Ouer**  
**DOL: 2/14/03**

207. To the extent that Paragraph 207 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 207.

208. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 208.

209. To the extent that Paragraph 209 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 209.

210. To the extent that Paragraph 210 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 210.

211. To the extent that Paragraph 211 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 211.

212. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 212.

213. To the extent that Paragraph 213 deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 213.

214. To the extent that Paragraph 214 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 214.

215. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 215.

216. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 216.

217. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 217.

218. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 218.

219. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 219.

**8. Claimant(s): Sally Kong, Chinda Kruth**  
**DOL: 11/27/02**

220. To the extent that Paragraph 220 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 220.

221. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 221.

222. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 222.

223. To the extent that Paragraph 223 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 223.

224. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 224.

225. To the extent that Paragraph 225 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 225.

226. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 226.

227. To the extent that Paragraph 227 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 227.

228. To the extent that Paragraph 228 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 228.

229. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 229.

230. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 230.

231. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 231.

232. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 232.

**9. Claimant(s): Pamela Nou, Saroeun Hou**  
**DOL: 09/06/01**

233. To the extent that Paragraph 233 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 233.

234. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 234.

235. To the extent that Paragraph 235 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 235.

236. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 236.

237. To the extent that Paragraph 237 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 237.

238. To the extent that Paragraph 238 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 238.

239. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 239.

240. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 240.

241. To the extent that Paragraph 241 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 241.

242. To the extent that Paragraph 242 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 242.

243. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 243.

244. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 244.



**10. Claimant(s): Kosal Nguon, Sokcheath Prak, Sophalla Chum, Sophaly Chum**  
**DOL: 12/14/98**

245. To the extent that Paragraph 245 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 245.

246. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 246.

247. To the extent that Paragraph 247 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 247.

248. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 248.

249. To the extent that Paragraph 249 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 249.

250. To the extent that Paragraph 250 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 250.

251. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 251.

252. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 252.

253. To the extent that Paragraph 253 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 253.

254. To the extent that Paragraph 254 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 254.

255. To the extent that Paragraph 255 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 255.

256. To the extent that Paragraph 256 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 256.

257. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 257.

258. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 258.

259. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 259.

260. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 260.

261. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 261.

262. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 262.

**11. Claimant(s): Emmy Vam, Naraveth Mak, Narayuth Mak, Sandy Mak**  
**DOL: 04/25/99**

263. To the extent that Paragraph 263 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 263.

264. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 264.

265. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 265.

266. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 266.

267. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 267.

268. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 268.

269. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 269.

270. To the extent that Paragraph 270 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 270.

271. To the extent that Paragraph 271 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 271.

272. To the extent that Paragraph 272 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 272.

273. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 273.

274. To the extent that Paragraph 274 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 274.

275. To the extent that Paragraph 275 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 275.

276. To the extent that Paragraph 276 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 276.

277. To the extent that Paragraph 277 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 277.

278. To the extent that Paragraph 278 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 278.

279. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 279.

280. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 280.

281. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 281.

282. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 282.

283. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 283.

284. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 284.

285. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 285.

**12. Claimant(s): Tim Oeun**  
**DOL: 09/21/01**

286. To the extent that Paragraph 286 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 286.

287. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 287.

288. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 288.

289. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 289.

290. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 290.

291. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 291.

292. To the extent that Paragraph 292 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 292.

293. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 293.

294. To the extent that Paragraph 294 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 294.

295. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 295.

296. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 296.

297. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 297.

298. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 298.

299. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 299.

300. McConnell admits that Socha Dy did work as a receptionist at the First Spine Lowell clinic during a certain period of McConnell's employment with Future Management, but lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in Paragraph 300.

**13. Claimant(s): Chanthu Phauk, Jacriya Phauk, Melinda Phauk,  
Channara Phauk, Veda Phauk, Johnny Phauk, Taevy Phauk,  
Dika Phauk, Channate Phauk**

**DOL: 11/02/03**

301. To the extent that Paragraph 301 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 301.

302. To the extent that Paragraph 302 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 302.

**14. Claimant(s): Michael Pho**

**DOL: 05/28/01**

303. To the extent that Paragraph 303 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 303.

304. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 304.

305. To the extent that Paragraph 305 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 305.



306. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 306.

307. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 307.

308. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 308.

309. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 309.

310. McConnell denies that a cranial nerve examination would be an integral part of the examination of every patient who had suffered a head trauma with reported tenderness, and lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in Paragraph 310.

311. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 311.

**15. Claimant(s): Nicki Phan and Bin Real**  
**DOL: 04/02/01**

312. To the extent that Paragraph 312 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 312.

313. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 313.

314. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 314.

315. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 315.

316. To the extent that Paragraph 316 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 316.

317. To the extent that Paragraph 317 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 317.

318. To the extent that Paragraph 318 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 318.

319. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 319.

**16. Claimant(s): Chithra Ung, Pholla Long, Sophinnary Ung, Samnang San,  
Volak Neang  
DOL: 02/07/02**

320. To the extent that Paragraph 320 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 320.

321. To the extent that Paragraph 321 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 321.

322. To the extent that Paragraph 322 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 322.

323. To the extent that Paragraph 323 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 323.

**17. Claimant(s): Sophoeun Kong**  
**DOL: 11/26/00**

324. To the extent that Paragraph 324 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 324.

325. To the extent that Paragraph 325 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 325.

**18. Claimant(s): Sitha Mam, Samnang Ngeth, Sitha Ngeth**  
**DOL: 03/15/02**

326. To the extent that Paragraph 326 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 326.

327. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 327.

328. To the extent that Paragraph 328 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 328.

329. To the extent that Paragraph 329 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 329.

330. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 330.

331. To the extent that Paragraph 331 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 331.

332. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 332.

**19. Claimant(s): Sovanna Uy and Lath Uy**  
**DOL: 09/18/02**

333. To the extent that Paragraph 333 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 333.

334. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 334.

335. To the extent that Paragraph 335 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 335.

336. To the extent that Paragraph 336 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 336.

**20. Claimant(s): Phen Chhon, Kim Sambath, Samnang Sok, Sophannara Eang**  
**DOL: 07/26/03**

337. To the extent that Paragraph 337 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 337.

338. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 338.

339. To the extent that Paragraph 339 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 339.

340. To the extent that Paragraph 340 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 340.

**21. Claimant(s): Nhem Ngeth and Hoeum Men**  
**DOL: 01/20/01**

341. To the extent that Paragraph 341 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 341.

342. To the extent that Paragraph 342 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 342.

343. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 343.

344. To the extent that Paragraph 344 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 344.

345. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 345.

**22. Claimant(s): Ratha So, Phyrum Chhim**  
**DOL: 05/16/01**

346. To the extent that Paragraph 346 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 346.

347. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 347.

348. To the extent that Paragraph 348 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 348.

349. To the extent that Paragraph 349 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 349.

**23. Claimant(s): Sareth Heang, Cang Keo, Khawaii Sok, Kim Neang**  
**DOL: 02/18/01**

350. To the extent that Paragraph 350 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 350.

351. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 351.

352. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 352.

353. To the extent that Paragraph 353 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 353.

**24. Claimant(s): Sokhan Yang**  
**DOL: 05/19/00**

354. To the extent that Paragraph 354 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 354.

355. To the extent that Paragraph 355 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 355.

356. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 356.

357. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 357.

358. To the extent that Paragraph 358 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or



information sufficient to form a belief as to the truth of the allegations contained in Paragraph 358.

359. To the extent that Paragraph 359 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 359.

360. To the extent that Paragraph 360 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 360.

361. To the extent that Paragraph 361 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 361.

**25. Claimant(s): Nikki Kim**  
**DOL: 02/13/01**

362. To the extent that Paragraph 362 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 362.

363. To the extent that Paragraph 363 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 363.

364. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 364.

365. To the extent that Paragraph 365 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 365.

366. To the extent that Paragraph 366 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 366.

**26. Claimant(s): Sophannee Uy**  
**DOL: 04/15/03**

367. To the extent that Paragraph 367 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 367.

368. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 368.

369. To the extent that Paragraph 369 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 369.

370. To the extent that Paragraph 370 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 370.

**27. Claimant(s): Dara Lay, Khon Lay**  
**DOL: 04/15/02**

371. To the extent that Paragraph 371 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 371.

372. To the extent that Paragraph 372 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 372.

373. To the extent that Paragraph 373 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 373.

374. To the extent that Paragraph 374 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 374.

**28. Claimant(s): Sunnak Chiv, Vandary Seng, Muth Seng, Sivinary Seng**  
**DOL: 08/14/01**

375. To the extent that Paragraph 375 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 375.

376. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 376.

377. To the extent that Paragraph 377 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 377.

378. To the extent that Paragraph 378 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 378.

**29. Claimant(s): Khen Khut, Chamroeun Sok, Mary Hean, Oeun Men,  
Sart Sok  
DOL: 04/01/01**

379. To the extent that Paragraph 379 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 379.

380. To the extent that Paragraph 380 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 380.

381. To the extent that Paragraph 381 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 381.

382. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 382.

383. To the extent that Paragraph 383 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 383.

384. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 384.

**30. Claimant(s): Lan Lim**  
**DOL: 02/19/00**

385. To the extent that Paragraph 385 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 385.

386. To the extent that Paragraph 386 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 386.

387. To the extent that Paragraph 387 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 387.

**31. Claimant(s): Radet Yam**  
**DOL: 08/29/00**

388. To the extent that Paragraph 388 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 388.

389. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 389.

390. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 390.

391. To the extent that Paragraph 391 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 391.

**32. Claimant(s): Ken Truong**  
**DOL: 12/10/03**

392. To the extent that Paragraph 392 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 392.

393. To the extent that Paragraph 393 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 393.

**33. Claimant(s): Sakun Sam, Jennifer Tran, Sophanee Uy**  
**DOL: 03/28/03**

394. To the extent that Paragraph 394 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 394.

395. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 395.

396. To the extent that Paragraph 396 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 396.

397. To the extent that Paragraph 397 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 397.

398. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 398.

399. To the extent that Paragraph 399 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 399.

400. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 400.

401. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 401.

402. To the extent that Paragraph 402 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 402.

**34. Claimant(s): Vanta Phanthanousinh, Keo Kothpratoum**  
**DOL: 06/28/03**

403. To the extent that Paragraph 403 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 403.

404. To the extent that Paragraph 404 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 404.

405. To the extent that Paragraph 405 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 405.



**35. Claimant(s): Phyrun Chhim**  
**DOL: 07/18/02**

406. To the extent that Paragraph 406 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 406.

407. To the extent that Paragraph 407 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 407.

408. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 408.

409. To the extent that Paragraph 409 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 409.

410. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 410.

411. To the extent that Paragraph 411 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 411.

412. To the extent that Paragraph 412 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 412.

**36. Claimant(s): Manilla Panya**  
**DOL: 04/19/02**

413. To the extent that Paragraph 413 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 413.

414. To the extent that Paragraph 414 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 414.

**37. Claimant(s): Chareth Rath, Kan Peov, Kristina Rath, Saleen Phan,**  
**Vongdeane Khiasoth**  
**DOL: 10/27/03**

415. To the extent that Paragraph 415 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 415.

416. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 416.

417. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 417.

418. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 418.

419. To the extent that Paragraph 419 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 419.

420. To the extent that Paragraph 420 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 420.

421. Denied.

422. To the extent that Paragraph 422 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 422.

423. To the extent that Paragraph 423 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 423.

424. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 424.

425. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 425.

426. To the extent that Paragraph 426 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 426.

427. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 427.

428. To the extent that Paragraph 428 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 428.

**38. Claimant(s): Ben Inthabane, Michael Inthabane**  
**DOL: 01/19/04**

429. To the extent that Paragraph 429 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 429.

430. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 430.

431. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 431.

432. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 432.

**39. Claimant(s): Sam Sok**  
**DOL: 05/14/04**

433. To the extent that Paragraph 433 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 433.

434. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 434.

435. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 435.

436. To the extent that Paragraph 436 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 436.

437. To the extent that Paragraph 437 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 437.

438. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 438.

439. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 439.

**40. Claimant(s): Ly Chan, Pheakdey Sok**  
**DOL: 10/02/02**

440. To the extent that Paragraph 440 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 440.

441. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 441.

442. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 442.

443. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 443.

444. To the extent that Paragraph 444 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 444.

445. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 445.

446. To the extent that Paragraph 446 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 446.

447. To the extent that Paragraph 447 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 447.

448. To the extent that Paragraph 448 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 448.

**41. Claimant(s): Ron Phay, Miriam Rivera, Susie Soeun**  
**DOL: 09/16/02**

449. To the extent that Paragraph 449 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 449.

450. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 450.

451. To the extent that Paragraph 451 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 451.

452. To the extent that Paragraph 452 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 452.

453. To the extent that Paragraph 453 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 453.

454. To the extent that Paragraph 454 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 454.

455. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 455.

456. To the extent that Paragraph 456 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 456.

457. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 457.

458. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 458.

459. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 459.

460. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 460.

461. To the extent that Paragraph 461 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 461.



**42. Claimant(s): Sarath Ros, Bunthy Chantha**  
**DOL: 02/13/02**

462. To the extent that Paragraph 462 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 462.

463. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 463.

464. To the extent that Paragraph 464 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 464.

465. To the extent that Paragraph 465 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 465.

466. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 466.

467. To the extent that Paragraph 467 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 467.

468. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 468.

**43. Claimant(s): It Toun, Vibol Chhan, Dam Ny, Hun Hum, Jim Bun, Tuy Pei, Chhoeum Yean**  
**DOL: 11/26/01**

469. To the extent that Paragraph 469 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 469.

470. To the extent that Paragraph 470 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 470.

471. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 471.

472. To the extent that Paragraph 472 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 472.

**44. Claimant(s): Savy Vong**  
**DOL: 03/16/04**

473. To the extent that Paragraph 473 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 473.

474. To the extent that Paragraph 474 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 474.

475. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 475.

476. To the extent that Paragraph 476 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 476.

477. To the extent that Paragraph 477 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 477.

**45. Claimant(s): Thaverei Veuk, Sareth Veuk, Thaverei Veuk**  
**DOL: 01/21/03**

478. To the extent that Paragraph 478 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 478.

479. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 479.

480. To the extent that Paragraph 480 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 480.

481. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 481.

482. To the extent that Paragraph 482 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 482.

483. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 483.

**46. Claimant(s): Pramahaphun Jaemvimon, Anirut Khaunphet**  
**DOL: 03/06/01**

484. To the extent that Paragraph 484 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 484.

485. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 485.

486. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 486.

487. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 487.

488. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 488.

489. To the extent that Paragraph 489 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 489.

490. To the extent that Paragraph 490 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 490.

**47. Claimant(s): Synha Louangsabouth, Oeuna Men**  
**DOL: 11/14/04**

491. To the extent that Paragraph 491 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 491.

492. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 492.

493. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 493.

494. To the extent that Paragraph 494 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 494.

495. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 495.

496. To the extent that Paragraph 496 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 496.

497. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 497.

498. To the extent that Paragraph 498 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 498.

499. To the extent that Paragraph 499 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 499.

500. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 500.

501. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 501.

**48. Claimant(s): Amanda Ferullo**  
**DOL: 11/04/04**

502. To the extent that Paragraph 502 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 502.

503. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 503.

504. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 504.

505. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 505.

**49. Claimant(s): Moch San, Sovanna Uy**  
**DOL: 10/11/03**

506. To the extent that Paragraph 506 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 506.

507. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 507.

508. To the extent that Paragraph 508 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 508.

509. To the extent that Paragraph 509 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 509.

**50. Claimant(s): Alexander Men, Mike Sun**  
**DOL: 02/07/05**

510. To the extent that Paragraph 510 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 510.

511. To the extent that Paragraph 511 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 511.

512. To the extent that Paragraph 512 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 512.

513. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 513.

**51. Claimant(s): Dalin Ou, Michael Soum**  
**DOL: 09/08/01**

514. To the extent that Paragraph 514 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 514.

515. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 515.

516. To the extent that Paragraph 516 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 516.



517. To the extent that Paragraph 517 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 517.

518. McConnell denies the allegations contained in Paragraph 518.

**52. Claimant(s): Timmy Tim, Oeun Tim**  
**DOL: 05/16/99**

519. To the extent that Paragraph 519 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 519.

520. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 520.

521. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 521.

522. To the extent that Paragraph 522 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 522.

523. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 523.

524. To the extent that Paragraph 524 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 524.

**53. Claimant(s): Veun Long**  
**DOL: 05/22/00**

525. To the extent that Paragraph 525 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 525

526. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 526

527. To the extent that Paragraph 527 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 527.

528. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 528.

529. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 528.

530. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 530.

531. To the extent that Paragraph 531 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 531.

532. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 532.

533. To the extent that Paragraph 533 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 533.

**54. Claimant(s): Chan Tim, Pheap Tim, Tob Lay, Vibol Tim**  
**DOL: 05/24/01**

534. To the extent that Paragraph 534 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 534.

535. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 535.

536. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 536.

537. To the extent that Paragraph 537 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 537.

538. To the extent that Paragraph 538 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 538.

539. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 539.

540. To the extent that Paragraph 540 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 540.

**55. Claimant(s): Marion Garcia, Paul Taylor**  
**DOL: 01/30/02**

541. To the extent that Paragraph 541 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 541.

542. To the extent that Paragraph 542 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 542.

543. To the extent that Paragraph 543 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 543.

**56. Claimant(s): Vich Lam**  
**DOL: 10/16/02**

544. To the extent that Paragraph 544 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 544.

545. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 545.

546. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 546.

547. To the extent that Paragraph 547 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 547.

548. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 548.

**57. Claimant(s): Kosal Nguon, Sokeheath Prak, Sophalla Chum,  
Sophally Chum  
DOL: 12/14/98**

549. To the extent that Paragraph 549 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 549.

550. To the extent that Paragraph 550 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 550.

551. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 551.

552. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 552.

553. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 553.

554. To the extent that Paragraph 554 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 554.

555. To the extent that Paragraph 555 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 555.

556. To the extent that Paragraph 556 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 556.

557. To the extent that Paragraph 557 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 557.

**58. Claimant(s): Peou Ing**  
**DOL: 11/09/99**

558. To the extent that Paragraph 558 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 558.

559. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 559.

560. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 560.

561. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 561.

562. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 562.

563. To the extent that Paragraph 563 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 563.

564. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 564.

**59. Claimant(s): Emmy Vann, Narayuth Mak, Sandy Mak, Run Phon,**  
**Yari Mak**  
**DOL: 04/25/99**

565. To the extent that Paragraph 565 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 565.

566. To the extent that Paragraph 566 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 566.

567. To the extent that Paragraph 567 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 567.

568. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 568.

569. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 569.

570. To the extent that Paragraph 570 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 570.

**60. Claimant(s): Sophy Porth, Phoeum Sam, Krapomroth Khim**  
**DOL: 03/18/02**

571. To the extent that Paragraph 571 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 571.



572. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 572.

573. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 573.

574. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 574.

575. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 575.

576. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 576.

577. To the extent that Paragraph 577 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 577.

**61. Claimant(s): Than Som**  
**DOL: 02/17/02**

578. To the extent that Paragraph 578 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 578.

579. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 579.

580. To the extent that Paragraph 580 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 580.

581. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 581.

582. To the extent that Paragraph 582 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 582.

**62. Claimant(s): Sunnhak Chiv**  
**DOL: 09/21/01**

583. To the extent that Paragraph 583 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 583.

584. To the extent that Paragraph 584 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 584.

585. To the extent that Paragraph 585 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 585.

**63. Claimant(s): Sacha Tang, Viphearea Srey, Wilson Souangchack**  
**DOL: 09/08/00**

586. To the extent that Paragraph 586 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 586.

587. To the extent that Paragraph 587 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 587.

588. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 588.

589. To the extent that Paragraph 589 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 589.

**64. Claimant(s): Chanda Kong, Chhang Kang, Phala Phoun**  
**DOL: 06/04/02**

590. To the extent that Paragraph 590 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 590.

591. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 591.

592. To the extent that Paragraph 592 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 592.

593. To the extent that Paragraph 593 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 593.

594. To the extent that Paragraph 594 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 594.

595. To the extent that Paragraph 595 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 595.

596. To the extent that Paragraph 596 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 596.

597. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 597.

**65. Claimant(s): Kamsot Kong**  
**DOL: 12/31/00**

598. To the extent that Paragraph 598 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 598.

599. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 599.

600. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 600.

601. To the extent that Paragraph 601 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 601.

**66. Claimant(s): Veasna Ngeth, Samnang Ngeth**  
**DOL: 06/25/00**

602. To the extent that Paragraph 602 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 602.

603. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 603.

604. To the extent that Paragraph 604 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 604.

605. To the extent that Paragraph 605 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 605.

606. To the extent that Paragraph 606 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 606.

607. To the extent that Paragraph 607 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 607.

608. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 608.

**67. Claimant(s): Nhoeun Hem, Mao Ngeth, Samnang Ngeth**  
**DOL: 12/31/02**

609. To the extent that Paragraph 609 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 609.

610. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 610.

611. To the extent that Paragraph 611 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 611.

612. To the extent that Paragraph 612 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 612.

613. To the extent that Paragraph 613 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 613.

614. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 614.

615. To the extent that Paragraph 615 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 615.

**68. Claimant(s): Cheatra So, Nheop So, Paulika So, Phaetra So, Savuth Phan,  
San Samnang, Alex Nunez  
DOL: 02/24/02**

616. To the extent that Paragraph 616 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 616.

617. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 617.

618. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 618.

619. To the extent that Paragraph 619 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 619.

620. To the extent that Paragraph 620 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 620.

621. To the extent that Paragraph 621 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 621.

622. To the extent that Paragraph 622 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 622.



623. To the extent that Paragraph 623 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 623.

624. To the extent that Paragraph 624 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 624.

**69. Claimant(s): Katherine Mana, Linda Nuth, Kimsat Nuth, Sothery Kull  
DOL: 08/12/03**

625. To the extent that Paragraph 625 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 625.

626. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 626.

627. To the extent that Paragraph 627 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 627.

628. To the extent that Paragraph 628 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 628.

629. To the extent that Paragraph 629 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 629.

630. To the extent that Paragraph 630 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 630.

631. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 631.

**70. Claimant(s): Song Taing**  
**DOL: 08/30/02**

632. To the extent that Paragraph 632 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 632.

633. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 633.

634. To the extent that Paragraph 634 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 634.

635. To the extent that Paragraph 635 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 635.

**71. Claimant(s): Phallun Ork, Sokkeng Gen**  
**DOL: 06/22/01**

636. To the extent that Paragraph 636 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 636.

637. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 637.

638. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 638.

639. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 639.

640. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 640.

641. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 641.

642. To the extent that Paragraph 642 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 642.

643. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 643.

644. To the extent that Paragraph 644 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 644.

**72. Claimant(s): Vannsak Vath, Savan Vat**  
**DOL: 04/04/02**

645. To the extent that Paragraph 645 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 645.

646. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 646.

647. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 647.

648. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 648.

649. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 649.

650. To the extent that Paragraph 650 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 650.

**73. Claimant(s): Roeun Kong, Sareth Nuon**  
**DOL: 05/22/01**

651. To the extent that Paragraph 651 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 651.

652. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 652.

653. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 653.

654. To the extent that Paragraph 654 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 654.

655. To the extent that Paragraph 655 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 655.

656. To the extent that Paragraph 656 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 656.

657. To the extent that Paragraph 657 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 657.

658. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 658.

**74. Claimant(s): Bin Suon, Ngeth Soeung**  
**DOL: 11/18/00**

659. To the extent that Paragraph 659 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 659.

660. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 660.

661. To the extent that Paragraph 661 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 661.

662. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 662.

663. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 663.

664. To the extent that Paragraph 664 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 664.

665. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 665.

666. Denied.

667. To the extent that Paragraph 667 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 667.

**75. Claimant(s): Hang Tran, Nguyet Nguyen**  
**DOL: 01/09/98**

668. To the extent that Paragraph 668 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 668.

669. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 669.

670. To the extent that Paragraph 670 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 670.

671. To the extent that Paragraph 671 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 671.

**76. Claimant(s): Punlork Sar, Jorge Diaz, Sambath Bo, Lysabad Bo, Samantha Mao, Samban Bo, Sambath Bo, Sambun Sar**  
**DOL: 01/09/98**

672. To the extent that Paragraph 672 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 672.

673. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 673.

674. To the extent that Paragraph 674 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 674.

675. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 675.

676. To the extent that Paragraph 676 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 676.

677. To the extent that Paragraph 677 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 677.



678. To the extent that Paragraph 678 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 678.

679. To the extent that Paragraph 679 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 679.

680. To the extent that Paragraph 680 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 680.

681. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 681.

682. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 682.

683. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 683.

684. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 684.

685. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 685.

686. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 686.

687. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 687.

688. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 688.

689. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 689.

690. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 690.

691. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 691.

692. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 692.

693. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 693.

694. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 694.

695. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 695.

696. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 696.

697. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 697.

698. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 698.

699. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 699.

700. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 700.

701. To the extent that Paragraph 701 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 701.

**77. Claimant(s): Saroeun Chan**  
**DOL: 02/02/99**

702. To the extent that Paragraph 702 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 702.

703. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 703.

704. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 704.

705. To the extent that Paragraph 705 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 705.

706. To the extent that Paragraph 706 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 706.

707. To the extent that Paragraph 707 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 707.

708. To the extent that Paragraph 708 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 708.

**78. Claimant(s): Savonn Yonn**  
**DOL: 10/19/02**

709. To the extent that Paragraph 709 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 709.

710. To the extent that Paragraph 710 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 710.

711. To the extent that Paragraph 711 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 711.

**79. Claimant(s): Nghlem Danh, Rosayadar Danh, Phirrun So and Jenifer Soneiga Hell**  
**DOL: 09/04/04**

712. To the extent that Paragraph 712 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 712.

713. To the extent that Paragraph 713 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 713.

#### **VIII. SPECIFIC ALLEGATIONS OF MAIL FRAUD RACKETEERING**

714. To the extent that Paragraph 714 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 714.

715. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 715.

716. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 716.

717. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 717.

718. To the extent that Paragraph 718 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 718.

719. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 719.

720. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 720.

721. To the extent that Paragraph 721 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 721.

722. To the extent that Paragraph 722 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 722.

723. To the extent that Paragraph 723 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 723.

724. To the extent that Paragraph 724 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 724.

725. To the extent that Paragraph 725 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 725.

726. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 726, except that she denies executing (or being asked to execute) the described confidentiality agreement.

**IX. SPECIFIC ALLEGATIONS REGARDING GIAMPA CHIROPRACTORS AND KENNEDY BROTHERS CONTROL OF THE ENTERPRISES**

727. The allegations of Paragraph 727 state a conclusion of law to which no response is required; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 727.

728. The allegations of Paragraph 728 state a conclusion of law to which no response is required; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 728.

729. The allegations of Paragraph 729 state a conclusion of law to which no response is required; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 729.

730. To the extent that Paragraph 730 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or

information sufficient to form a belief as to the truth of the allegations contained in Paragraph 730.

731. McConnell denies the allegations contained in Paragraph 731.

732. McConnell denies the allegations contained in Paragraph 732.

733. McConnell denies the allegations contained in Paragraph 733.

734. McConnell denies the allegations contained in Paragraph 734.

735. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 735.

736. To the extent that Paragraph 736 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 736.

737. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 737.

738. To the extent that Paragraph 738 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 738.

739. The allegations of Paragraph 739 state a conclusion of law to which no response is required.

740. The allegations of Paragraph 740 state a conclusion of law to which no response is required; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 740.



741. The allegations of Paragraph 741 state a conclusion of law to which no response is required; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 741.

742. The allegations of Paragraph 742 state a conclusion of law to which no response is required; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 742.

743. The allegations of Paragraph 743 state a conclusion of law to which no response is required; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 743.

744. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 744.

**X. FRAUDULENT CONCEALMENT**

745. To the extent that Paragraph 745 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 745.

746. To the extent that Paragraph 746 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 746.

747. To the extent that Paragraph 747 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 747.

748. To the extent that Paragraph 748 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 748.

749. To the extent that Paragraph 749 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 749.

**XI. DAMAGES**

750. To the extent that Paragraph 750 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 750.

**XII. CAUSES OF ACTION**

**COUNT I**  
**VIOLATION OF 18 U.S.C. §1962(c)**  
**(Against Frederick Giampa, Joseph Giampa,**  
**Edward Kennedy, Brian Culliney and Jennifer McConnell)**

751. McConnell repeats and incorporates by reference her responses to Paragraphs 1 through 750 of the Complaint as if fully set forth herein.

752. To the extent that Paragraph 752 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 752.

753. To the extent that Paragraph 753 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 753.

754. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 754.

755. To the extent that Paragraph 755 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 755.

756. To the extent that Paragraph 756 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 756.

757. To the extent that Paragraph 757 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 757.

758. The allegations of Paragraph 758 state a conclusion of law to which no response is required. To the extent that Paragraph 758 is deemed to contain allegations of wrongdoing by McConnell, they are denied.

759. The allegations of Paragraph 759 state a conclusion of law to which no response is required. To the extent that Paragraph 759 is deemed to contain allegations of wrongdoing by McConnell, they are denied.

760. To the extent that Paragraph 760 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 760.

761. McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 761.

762. The allegations of Paragraph 762 state a conclusion of law to which no response is required. To the extent that Paragraph 762 is deemed to contain allegations of wrongdoing by McConnell, they are denied.

763. The allegations of Paragraph 763 state a conclusion of law to which no response is required.

764. The allegations of Paragraph 764 state a conclusion of law to which no response is required.

765. The allegations of Paragraph 765 state a conclusion of law to which no response is required. To the extent that Paragraph 765 is deemed to contain allegations of wrongdoing by McConnell, they are denied.

766. The allegations of Paragraph 766 state a conclusion of law to which no response is required. To the extent that Paragraph 766 is deemed to contain allegations of wrongdoing by McConnell, they are denied.

767. The allegations of Paragraph 767 state a conclusion of law to which no response is required. To the extent that Paragraph 767 is deemed to contain allegations of wrongdoing by McConnell, they are denied.

768. The allegations of Paragraph 768 state a conclusion of law to which no response is required. To the extent that Paragraph 768 is deemed to contain allegations of wrongdoing by McConnell, they are denied.

**COUNT II**  
**INNOCENT VICTIM ENTERPRISE VIOLATION OF 18 U.S.C. §1962(c)**  
**(Against All Defendants)**

769. McConnell repeats and incorporates by reference her responses to Paragraphs 1 through 768 of the Complaint as if fully set forth herein.

770. The allegations of Paragraph 770 state a conclusion of law to which no response is required.

771. The allegations of Paragraph 771 state a conclusion of law to which no response is required. To the extent that Paragraph 771 is deemed to contain allegations of wrongdoing by McConnell, they are denied.

772. The allegations of Paragraph 772 state a conclusion of law to which no response is required. To the extent that Paragraph 772 is deemed to contain allegations of wrongdoing by McConnell, they are denied.

773. The allegations of Paragraph 773 state a conclusion of law to which no response is required. To the extent that Paragraph 773 is deemed to contain allegations of wrongdoing by McConnell, they are denied.

774. The allegations of Paragraph 774 state a conclusion of law to which no response is required. To the extent that Paragraph 774 is deemed to contain allegations of wrongdoing by McConnell, they are denied.

775. The allegations of Paragraph 775 state a conclusion of law to which no response is required. To the extent that Paragraph 775 is deemed to contain allegations of wrongdoing by McConnell, they are denied.

**COUNT III**  
**VIOLATION OF 18 U.S.C. §1962(d)**  
**(Against All Defendants)**

776. McConnell repeats and incorporates by reference her responses to Paragraphs 1 through 775 of the Complaint as if fully set forth herein.

777. The allegations of Paragraph 777 state a conclusion of law to which no response is required. To the extent that Paragraph 777 is deemed to contain allegations of wrongdoing by McConnell, they are denied.

778. The allegations of Paragraph 778 state a conclusion of law to which no response is required. To the extent that Paragraph 778 is deemed to contain allegations of wrongdoing by McConnell, they are denied.

779. The allegations of Paragraph 779 state a conclusion of law to which no response is required. To the extent that Paragraph 779 is deemed to contain allegations of wrongdoing by McConnell, they are denied.

**COUNT IV**  
**Mass.Gen.Laws Ch. 93A**  
**(Against All Defendants)**

780. McConnell repeats and incorporates by reference her responses to Paragraphs 1 through 779 of the Complaint as if fully set forth herein.

781. The allegations of Paragraph 781 state a conclusion of law to which no response is required.

782. The allegations of Paragraph 782 state a conclusion of law to which no response is required.

783. The allegations of Paragraph 783 state a conclusion of law to which no response is required.

784. To the extent that Paragraph 784 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 784.

785. The allegations of Paragraph 785 state a conclusion of law to which no response is required. To the extent that Paragraph 785 is deemed to contain allegations of wrongdoing by McConnell, they are denied.

786. The allegations of Paragraph 786 state a conclusion of law to which no response is required. To the extent that Paragraph 786 is deemed to contain allegations of wrongdoing by McConnell, they are denied.

787. The allegations of Paragraph 787 state a conclusion of law to which no response is required. To the extent that Paragraph 787 is deemed to contain allegations of wrongdoing by McConnell, they are denied.

788. To the extent that Paragraph 788 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 788.

789. The allegations of Paragraph 789 state a conclusion of law to which no response is required. To the extent that Paragraph 789 is deemed to contain allegations of wrongdoing by McConnell, they are denied.

**COUNT V**  
**CIVIL CONSPIRACY**  
**(Against All Defendants)**

790. McConnell repeats and incorporates by reference her responses to Paragraphs 1 through 789 of the Complaint as if fully set forth herein.

791. The allegations of Paragraph 791 state a conclusion of law to which no response is required. To the extent that Paragraph 791 is deemed to contain allegations of wrongdoing by McConnell, they are denied.

792. The allegations of Paragraph 792 state a conclusion of law to which no response is required. To the extent that Paragraph 792 is deemed to contain allegations of wrongdoing by McConnell, they are denied.

793. To the extent that Paragraph 793 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 793.

**COUNT VI**  
**FRAUD**  
**(Against All Defendants)**

794. McConnell repeats and incorporates by reference her responses to Paragraphs 1 through 793 of the Complaint as if fully set forth herein.

795. To the extent that Paragraph 795 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 795.

796. To the extent that Paragraph 796 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or



information sufficient to form a belief as to the truth of the allegations contained in Paragraph 796.

797. To the extent that Paragraph 797 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 797.

798. To the extent that Paragraph 798 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 798.

799. To the extent that Paragraph 799 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 799.

800. To the extent that Paragraph 800 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 800.

**COUNT VII**  
**INTENTIONAL INTERFERENCE WITH ADVANTAGEOUS BUSINESS**  
**AND CONTRACTUAL RELATIONSHIPS**  
**(Against All Defendants)**

801. McConnell repeats and incorporates by reference her responses to Paragraphs 1 through 800 of the Complaint as if fully set forth herein.

802. To the extent that Paragraph 802 is deemed to contain allegations of wrongdoing by McConnell, they are denied; otherwise, McConnell lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 802.

### **AFFIRMATIVE DEFENSES**

McConnell puts forth the following affirmative defenses and reserves the right to raise additional defenses based on information learned in discovery.

#### **FIRST AFFIRMATIVE DEFENSE**

Plaintiff has failed to state any claim against McConnell upon which relief may be granted.

#### **SECOND AFFIRMATIVE DEFENSE**

Plaintiff may not prevail on its fraud-based claims against McConnell because Plaintiff has failed to satisfy the pleading requirements of F.R.C.P. 9(b).

#### **THIRD AFFIRMATIVE DEFENSE**

Plaintiff's claims against McConnell are barred by the Doctrine of Laches.

#### **FOURTH AFFIRMATIVE DEFENSE**

Plaintiff's claims against McConnell are barred by the Doctrine of Waiver.

#### **FIFTH AFFIRMATIVE DEFENSE**

Plaintiff's claims against McConnell are barred by the applicable Statute of Limitations.

#### **SIXTH AFFIRMATIVE DEFENSE**

Plaintiff's claims against McConnell are barred by the applicable Statute of Repose.

SEVENTH AFFIRMATIVE DEFENSE

Plaintiff's claims against McConnell are barred by the doctrine of Equitable Estoppel.

EIGHTH AFFIRMATIVE DEFENSE

Plaintiff's RICO and fraud claims against McConnell are barred by an absence of justifiable reliance.

NINTH AFFIRMATIVE DEFENSE

Plaintiff's RICO claims against McConnell are barred by the theory of non-predicate misconduct.

TENTH AFFIRMATIVE DEFENSE

Plaintiff's RICO claims are barred by the intra-corporate conspiracy defense.

ELEVENTH AFFIRMATIVE DEFENSE

Plaintiff may not prevail on its claims against McConnell because Plaintiff's injuries, if any, resulted from its own negligent or wrongful conduct or the conduct of third parties for whom McConnell is not responsible.

TWELVTH AFFIRMATIVE DEFENSE

Plaintiff's claims against McConnell are barred by McConnell's good faith.

THIRTEENTH AFFIRMATIVE DEFENSE

Plaintiff's claims against McConnell violate G.L. c. 231, § 6F in that they are frivolous, and not advanced for any proper purpose, but rather to burden McConnell with the costs and expenses of litigation in order to extort a settlement or other improper advantage over McConnell and the other named defendants.

WHEREFORE, McConnell requests that this Court award judgment against Plaintiff as follows:

1. Dismiss with prejudice all claims against McConnell in the Complaint;
2. Award McConnell her costs and expenses, including reasonable attorneys' fees, pursuant to G.L. c. 231, §6F, for defending against the Complaint; and
3. Grant McConnell such other and further relief as this Court deems just and proper.

**A TRIAL BY JURY IS DEMANDED ON ALL COUNTS SO TRIABLE.**

Respectfully submitted,

JENNIFER MCCONNELL

By her attorney,

/s/ Thomas M. Ciampa

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(617) 742-5955

Dated: December 13, 2006

**Certificate of Service**

I hereby certify that this document filed through the ECF system pursuant to Local Rule 5.4 will be sent electronically to all other parties.

\_\_\_\_/s/ Thomas M. Ciampa\_\_\_\_